

A-302

**ATTACHMENT 4
CONTINGENCY PLAN**

1.0 CONTINGENCY PLAN

This section presents the facility Contingency Plan for the former Safety-Kleen (S-K) Silver Spring, Maryland service center. The goal is to assure that a coordinated response by Trihydro Corporation and the departments and agencies of the federal, state and local government will be conducted to minimize damaging effects for human health and the environment in case of an emergency.

Assumed emergencies and test conditions outlined in this plan include:

- Fire
- Explosion
- Spill of Hazardous Waste
- Surface Water Contamination
- Severe Weather Conditions, and
- Shutdown of Operations

The contingency plan is to be carried out immediately whenever there is a release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. Once approved, copies of this document will be provided to local authorities and organizations which may provide emergency services the former Silver Spring Service Center. In addition, this plan and all revisions to the plan will be made readily available to technicians working at the former service center.

The plan will be reviewed and updated, if necessary, whenever:

- The applicable regulations are revised;
- The list or location of emergency equipment changes;
- The remediation system design changes, construction, operation maintenance, or other circumstances in a way that:
 - Would have increased the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or;



- Changed the response necessary in an emergency;
- The names, addresses, or phone numbers of emergency coordinators changed;
- When implemented in an emergency.

1.1 GENERAL INFORMATION

The former service center (now closed) operator was Safety-Kleen Corporation and the former service center address was 12164 Tech Road, Silver Spring, Maryland 20904. Trihydro Corporation is the environmental consultant that will be providing the operation and maintenance for a remediation system that will be treating residual hydrocarbons in the soil and groundwater beneath the site. A detailed contingency plan will be included with the engineering design packaged, as an addendum to this report.

1.2 EMERGENCY COORDINATOR

The following presents the list of emergency coordinators for the remediation system at the former Silver Spring Service Center. The state will be provided with updated lists as changes occur.

Environmental Consultant, Project Manager:

Sara Brothers 6434 Rio Grande BLVD NW, Albuquerque, NM 87107

Office: 505/341-0476

Home: 505/345-3252

Cell: 505/280-0344

Todd Forry, Corporate Health and Safety Manager, Laramie, WY

Office: 307/745-7474

Cell: 307/760-8269

Safety-Kleen Primary Emergency Coordinator:

Chris Snype,

Cell: 571/437-6619

Home: 703/580-1277

Safety-Kleen Alternate Emergency Coordinator:

Matt Nothdurft,

Cell: 571/437-6620

Home: 540/327-3707

Kerry Jenkins,

Cell: 571/437-5547

Home: 540/253-7046

Safety-Kleen Project Manager:

Gerhard L. Risse, 4800 S. Old Peach Tree Road, Norcross, GA 30071

Office: 770/481-1860

Any individual reporting an emergency will start by contacting the primary emergency coordinator and, if unsuccessful, try to reach the alternate emergency coordinator. The emergency coordinator is responsible for implementing the contingency plan during an emergency.

The emergency coordinator and the alternate are familiar with all aspects of the contingency plan, the operations and activities at the former service center, characteristics of materials handled, the location of all records within the former service center, and the remediation system layout. In addition, these coordinators have the authority to commit the resources necessary to carry out the contingency plan. At least one of the designated emergency coordinators are on call at all times to respond to an emergency situation.

1.3 IMPLEMENTATION

The decision to implement the contingency plan depends upon whether an imminent or actual incident could threaten human health or the environment. This section provides the guidance that the emergency coordinators, through decision-making criteria, will use to assist them in making the decision.

Emergencies may occur at any time as a result of natural forces, trespassing, accidents, hazardous substances spills, or other situations that disrupt essential operations. Table 4 summarizes the types and nature of emergency situations that will require implementation of the contingency plan. Once the contingency plan is implemented the emergency coordinator may choose to contact the organizations listed on Table 5 for assistance.

Based on the emergency response procedures described in this section, the chain of command during an emergency is as follows:

- The person who discovered/causes the spill reports to the Trihydro Corporation Project Manager/emergency coordinator.
- The Trihydro Corporation Project Manager/emergency coordinator is to contact the Safety-Kleen Project Manager/Environment, Health and Safety Department.

- Either the Trihydro Corporation/emergency coordinator or the Safety-Kleen Project manager/Environment, Health and Safety Department will report to the Maryland Department of the Environment, Hazardous and Solid Waste Management Administration, Emergency Response Program.

The Maryland Department of the Environment will be notified whenever the contingency plan is implemented.

1.4 EMERGENCY RESPONSE PROCEDURE

The following procedures are the responsibility of the emergency coordinator or his designee whenever the contingency plan is implemented. These procedures will be rehearsed as part of the overall training program for remediation system at the former Safety-Kleen site.

Notification

In the case of an imminent or actual emergency situation and the contingency plan is implemented, the emergency coordinator (or the alternate when the emergency coordinator is not available) is to do the following immediately:

1. Immediately notify the Trihydro Corporation Project Manager at 505-341-0476, who will then notify the Safety-Kleen Project Manager/Environment, Health and Safety department at 770-418-1860, who will then notify the Maryland Department of the Environment or instruct the emergency coordinator to do so;
2. Notify other appropriate state or local agencies with designated response roles, as necessary.

Upon implementation of the contingency plan, the Trihydro Corporation Project Manager/emergency response coordinator is to notify via telephone, the agencies listed in Table 5, Emergency Contacts as necessary.

Identification of Hazardous Materials

In case of a release, fire, or explosion, the Trihydro Corporation Project Manager/emergency coordinator is to immediately try to identify the character, exact source, amount, and extent of any contamination. Any material that are currently on site have been characterized, and therefore are known and easily

identifiable in an emergency situation. If necessary, however, outside laboratories may be contacted to perform chemical analysis.

Assessment

The Trihydro Corporation Project Manager/emergency coordinator will assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment considered both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fires).

The Trihydro Corporation Project Manager/emergency coordinator will determine:

1. The hazardous properties of the involved materials by review of Material safety Data Sheets (Appendix B).
2. The population at risk both onsite and off-site.
3. The contribution of current environmental conditions to the seriousness of the situation; i.e., windspeed, ground moisture, relative humidity, temperature, etc.
4. The readiness and suitability of the available equipment.

Control Procedures

Response actions to be taken in specific emergency situations are described in the paragraphs which follow. Some response actions may require the use of a self-contained breathing apparatus (SCBA). These response actions may need to be undertaken by an outside contractor only. All spills are to be immediately reported to the Trihydro Corporation Project Manager/emergency coordinator who will then decide whether or not to implement the contingency plan.

Minor spills: If any recovered product is spilled the field technician at the site as directed by the Trihydro Corporation Project Manager/emergency coordinator will insure that all sources of ignition (e.g., thermostats or light switches) are left in the same position (either on or off) as at the time of the spill. Then, following the instructions of the appropriate Material Safety Data Sheets (see Appendix B), under the direction of the Trihydro Corporation Project Manager/emergency coordinator, the field technician will enter the area wearing appropriate protective equipment (rubber gloves, tyvek, safety glasses, and a

respirator, if required, and collect the product using sorbent material containerize it (using a shovel, broom and/or squeegee if necessary) in a DOT approved drum.

The cleanup of spilled product will be completed only when the workers have cleaned themselves and the emergency equipment with soap and water. The Trihydro Corporation Project Manager/emergency coordinator is to visually inspect any cleanup equipment, after it had been decontaminated, to insure task completion. The Maryland department of the Environment will be contacted if the contingency plan is implemented and/or a reportable quantity of waste is release to the environment.

Major Spills: Any spill which can not be completely remediated using the methods described above is a major spill and will require implementation of the contingency plan. Emergency response to this type of spill will be as follows (under the direction of the Trihydro Corporation Project Manager/emergency coordinator):

1. Don projective equipment described by the appropriate Material Safety Data Sheet.
2. Assist any injured people.
3. Stop the flow of material, if possible.
4. Retain, contain or slow the flow of the material if it can not be stopped. If a waste storage system or its secondary containment are leaking or are otherwise unfit for use, the flow of waste to the system must stop and the system must be inspected to determine the cause of the problem.
5. If waste escapes containment efforts, immediately call the local Fire Department, and report to the Trihydro Corporation Project Manager/emergency coordinator and the Safety-Kleen Project Manager/Environment, Health and Safety Department.
6. Begin recovery operations immediately to reduce property and environmental damage.

The Trihydro Corporation Project Manager/Emergency Coordinator is to report any incident as soon as possible to the Safety-Kleen Project Manager (770-418-1860) and or the Safety-Kleen Environment, Health and Safety department using the 24-hour telephone number (800-468-1760). If necessary the Environment, Health and Safety Department or the emergency coordinator would report the incident to the National Response Center (telephone: 800-424-8802) and the Maryland Department of the Environment (telephone: 410-974-3551).

The person reporting a spill is to be prepared to give his name, position, company name, address and telephone number. The person reporting is also to describe the material spilled and, if possible, some estimate of the amount, the containment status, and specify any equipment needed.

Contaminated material resulting from remedial actions for major spills will be disposed of at a permitted facility or at an operating Safety-Kleen recycle center.

Fire and Explosion Control Procedures: If a fire or explosions to occur, personnel must first notify the Trihydro Corporation Project Manager/emergency coordinator and then act quickly with the fire extinguisher to put out the fire before it spreads. If it can not be extinguished immediately, evacuation of the site is to occur and a call to the fire department will be made.

Natural Disasters/Civil Unrest: In a tornado, earthquake, heavy snowfall, or rain storm exceeding the 24-hour, 100-year amount (i.e. 7.19 inches) the site will have been evacuated or activities curtailed as necessary until the event is over. After a natural disaster the remediation system will be inspected for damage and Trihydro Corporation and Safety-Kleen would notify the Maryland Department of the Environment of any permit non-compliance.

In the event of civil unrest around the former service center, the Montgomery County Police, Silver Spring District Station and if necessary, the Maryland State Police will be notified.

Prevention of Recurrence of Fires, Explosions, or Releases

During an emergency, the Trihydro Corporation Project Manager/emergency coordinator will direct the field personnel to take all measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the site. These measures must include, where applicable, stopping the remediation system operation, collecting and containing any released substances, and removing or isolating containers.

Specific actions to prevent the recurrence or spread of fires, explosions, or releases included determining the source or cause of the incident; ceasing remediation system operation and turning off all SVE/recovered product feed lines, and power supply to the affected area; cleaning up debris from the incident and maintaining good housekeeping; containing and collecting all released waste; recovering and isolating affected containers; ensuring fire is completely extinguished; and decontaminating the affected area/equipment.

Examples of further measures to prevent the recurrence or spread of fires, explosions or releases include prohibiting smoking in all areas except designated areas, using spark-proof tools, isolating the waste by removing all ignition or reaction sources, and protecting the area from open flames, cutting and welding activities, hot surfaces, frictional heat, etc. If fire or explosion is an ongoing hazard, standby fire-fighting equipment will be maintained in a ready state until the emergency is over.

After the emergency is under control and equipment had been decontaminated, an investigation into the causes of the emergency event will be performed. An investigation will be completed which should determine the direct and contributing causes of the incident which led to the emergency event. The objective of this investigation is to develop measures to prevent recurrence of this incident.

Storage and Treatment of Released Material

Immediately after an emergency, the Trihydro Corporation Project Manager/emergency coordinator will characterize all recovered wastes, impacted soils, and waters. Arrangements for any necessary off-site treatment or disposal will be completed as soon as possible after the conclusion of the emergency. Accumulated materials will be containerized to the extent practical for off-site disposal, recycling or treatment at an operating permitted facility.

Incompatible Waste

The Trihydro Corporation Project Manager/emergency coordinator will ensure that, in the affected areas(s) of the site, no substance that may be incompatible with the released material will be brought onsite until cleanup procedures are completed. The wastes handled by Safety-Kleen (and therefore, the wastes being remediated) are not incompatible with one another. These wastes are only incompatible with strong oxidizers and reactive metals, neither of which were or will be kept onsite.

Post-Emergency Equipment Maintenance

The Trihydro Corporation Project Manager/emergency coordinator will ensure that all emergency equipment used in the contingency plan will be cleaned and fit for its intended use before operations are resumed. Cleanup was only completed when the workers have cleaned themselves and the emergency equipment with soap and water. The Trihydro Corporation Project Manager/emergency coordinator is to visually inspect any cleanup equipment, after it has been decontaminated to ensure cleanliness and operability, and is then to notify the Maryland Department of the Environment that the site is in compliance with COMAR 26.13.05.04G(9).

Personal protection and emergency response equipment includes eye protection, proper footwear, hand protection, respiratory protection, other protective clothing/equipment, and absorbent materials. The procedures for use of this equipment are summarized as follows:

Eye Protection: Approved industrial safety glasses with side shields and clear lenses, goggles or visitor safety glasses are required to be worn at all times in work areas.

Footwear: Proper footwear is required of all personnel at all times in the work areas. Employees are required to wear safety shoes on site.

Hand Protection: Appropriate chemical resistant gloves are to be worn by all personnel who may have contact with chemical substances.

Respiratory Protective Equipment: Respirators are selected and used on the basis of the hazards to which technicians are potentially exposed, as determined by periodic evaluation of workplace environmental conditions and work area monitoring. A separate, written respiratory protection program has been established pursuant to 29 CFR Part 1910 – Personal Protection Equipment.

Other Protective Clothing/Equipment: Level “D” Tyvek, coveralls, and other protective clothing are provided to all personnel who have potential contact with any hazardous waste.

1.5 COORDINATION AGREEMENTS

Arrangements will be made to familiarize the police department, fire department and local emergency response teams with the layout of the remediation system, the properties of hazardous materials handled and associated hazards, locations where personnel normally work, entrances to and roads inside the former service center, and possible evacuation routes. Arrangements will also be made to familiarize the local hospital with the types of injuries or illnesses which could result from fires, explosions, or releases at the remediation compound. Copies of the letters to the local police department, fire department and hospital were filed when the facility was operating. These letters will be updated to inform these agencies that the Safety-Kleen facility has been decommissioned and that a remediation system will be operating in the near future. An emergency response contractor identified in Table 5 will provide emergency assistance during a release and/or cleanup, as necessary.

1.6 EVACUATION PLAN

The Trihydro Corporation Project Manager/emergency coordinator will notify personnel to evacuate should an emergency arise through the onsite technician. If an uncontrolled fire or release occurs, all personnel are to be evacuated from the area and assembled at the entrance to the former service center to ensure that all personnel are accounted for and out of the hazardous area. Evacuation routes from the facility are to the north and south along Tech Drive. The fire department will be notified at the time of evacuation.

1.7 REQUIRED REPORTS

If the Trihydro Corporation Project Manager/emergency coordinator determines that the remediation system had a release that could threaten human health or the environment, the Trihydro Corporation Project Manager/emergency coordinator must report all findings as follows:

1. If the assessment indicates that evacuation of local areas may be advisable, the Trihydro Corporation Project Manager/emergency coordinator must immediately notify appropriate authorities (i.e., fire, police, and local emergency agency).
2. The Trihydro Corporation Project Manager/emergency coordinator is to immediately notify the Safety-Kleen Project Manager and/or Safety-Kleen Environment, including the:
 - a. Name and telephone number of notifier;
 - b. Name and address of service center;
 - c. Time and type of incident (e.g., release, fire);
 - d. Name and quantity of material(s) involved, to the extent known;
 - e. The extent of injuries, if any; and
 - f. The possible hazards to human health, or the environment outside the service center.

The Trihydro Corporation Project Manager/emergency coordinator will document the time, date, and details of any incident that required the implementation of the contingency plan. Within 5 days of the incident, Safety-Kleen will submit a written report on the incident to the Maryland Department of the Environment as required by COMAR 26.13.05.04G(10). The report must include:

1. Name, address, and telephone number of the owner or operator;
2. Name, address, and telephone number of the site;



3. Date, time, and type of incident (e.g., fire, explosion);
4. Name and quantity of material(s) involved;
5. The extent of injuries, if any;
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
7. Estimated quantity and disposition of recovered material that results from the incident.

A copy of this report will be kept of file at the site and in the project files.

1.8 AVAILABILITY AND REVISION OF THE CORRECTIVE ACTION PLAN

This plan and all revisions to the plan will be kept in the site file records and regularly updated throughout the operating life of the remediation project. Copies of this document will be provided to the local authorities and organizations listed on Table 5 which may provide emergency services. In addition, this plan and all revisions to the plan are made readily available to employees working at the site.

The plan will be reviewed and updated, if necessary, whenever.

- The applicable regulations are revised;
- The site or location of emergency equipment changes;
- If the remediation system changed in its design, construction, operation maintenance, or other circumstances in a way that increased the potential for fires, explosions, or releases of hazardous constituents, or changed the response necessary in an emergency;
- Names, addresses, or phone numbers of emergency coordinators change;
- Or if the plan failed when implemented in an emergency.